



Federated Wireless, Inc.  
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March 29, 2019

**VIA ECFS AND HAND FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: Request for Confidential Treatment**  
**Federated Wireless, Inc. Supplement to Proposal for Initial Commercial Deployment**  
**in the Citizens Broadband Radio Service**  
*Wireless Telecommunications Bureau and Office of Engineering and Technology*  
*Establish Procedure and Deadline for Filing Spectrum Access System (SAS)*  
*Administrator(s) and Environmental Sensing Capability (ESC) Operator(s)*  
*Applications, GN Docket No. 15-319*

Dear Ms. Dortch:

Federated Wireless, Inc. (“Federated Wireless”) hereby submits the attached supplement (“Supplement”) to its proposal for its Initial Commercial Deployment (“ICD”) in the Citizens Broadband Radio Service (“CBRS”) in response to the Public Notice issued by the Federal Communications Commission (“Commission” or “FCC”) requesting proposals from conditionally approved Spectrum Access System (“SAS”) Administrators in the above-captioned proceeding.<sup>1</sup> Pursuant to 47 C.F.R. §§ 0.457, 0.459, Federated Wireless requests confidential treatment for the company-specific, highly sensitive and proprietary commercial information in the attached Supplement and accompanying attachments. The confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act and has been redacted from the version electronically filed with the Commission.

In support of this request and pursuant to Section 0.459(b) of the Commission’s rules, Federated Wireless hereby states as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

Federated Wireless requests confidential treatment with respect to the confidential information contained in Attachments 1, 2, and 3 to the Supplement and redacted from the version filed electronically with the Commission.

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<sup>1</sup> *Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System Initial Commercial Deployment Proposals*, GN Docket No. 15-319, Public Notice, DA 18-783 (WTB/OET 2018).

**2. Identification of the circumstance giving rise to the submission.**

Federated Wireless is supplementing its proposal for CBRS ICD in an open Commission proceeding.

**3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.**

The confidential information in the Supplement and associated attachments is highly sensitive commercial information specific to the proprietary research, development, and strategies of Federated Wireless. This information is generally safeguarded from competitors and is not made available to the public.

**4. Explanation of the degree to which the information concerns a service that is subject to competition.**

The confidential information details the functioning of the Federated Wireless SAS and location of CBRS user sites, and Federated Wireless and other SAS Administrators will compete vigorously on the basis of the sensing and spectrum management services provided through their products.

**5. Explanation of how disclosure of the information could result in substantial competitive harm.**

Disclosure of the redacted information could cause substantial competitive harm to Federated Wireless, because it would provide competitors insight into confidential research, development, operational, and strategic information that would not otherwise be available, which would work to Federated Wireless's severe competitive disadvantage.

**6. Identification of any measures taken to prevent unauthorized disclosure.**

Federated Wireless routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

Federated Wireless does not make the redacted information available to the public, and this information has not been previously disclosed to third parties.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

Federated Wireless requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to Federated Wireless.

Respectfully submitted,

/s/ Jennifer M. McCarthy  
Jennifer M. McCarthy  
Vice President, Legal Advocacy  
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**RE: Federated Wireless, Inc. Supplement to Proposal for Initial Commercial Deployment in the Citizens Broadband Radio Service**  
*Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System (SAS) Administrator(s) and Environmental Sensing Capability (ESC) Operator(s) Applications, GN Docket No. 15-319*

Dear Ms. Dortch:

Federated Wireless, Inc. (“Federated Wireless”) is pleased to submit this supplement (“Supplement”) to its proposal for Initial Commercial Deployment (“ICD”) in the Citizens Broadband Radio Service (“CBRS”) in response to the Public Notice issued by the Federal Communications Commission (“Commission”) requesting proposals from conditionally approved Spectrum Access System (“SAS”) Administrators.<sup>1</sup> Federated Wireless continues to see considerable market demand from our partners and we are eager to move forward with ICD to thoroughly test the SAS under real-world conditions and maintain the significant momentum built by the CBRS industry in preparation for a full-scale commercial launch in the CBRS band in the very near future.

Federated Wireless remains fully committed to continuing its partnership with the Commission, the National Telecommunications and Information Administration (“NTIA”), and the Department of Defense (“DoD”) to see CBRS through to full commercialization and ensure its success by demonstrating the scalability, interoperability, and reliability of the CBRS ecosystem.

Excitement for the CBRS band continues to build and the Commission soon will see the benefits of its leadership in adopting the innovative sharing framework that governs CBRS, and its expeditious movement to enable consumer access to CBRS services. Industry and the SAS technology are both ready for the initiation of commercial operations. The anticipated deployments reflect the full breadth of CBRS use cases, with partners deploying wireless carrier, MVNO, private LTE, and fixed wireless broadband access systems in indoor, outdoor, and

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<sup>1</sup> *Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System Initial Commercial Deployment Proposals*, GN Docket No. 15-319, Public Notice, DA 18-783 (WTB/OET 2018) (“ICD PN”); *see also* Federated Wireless, Inc., Proposal for Initial Commercial Deployment in the Citizens Broadband Radio Service, GN Docket No. 15-319 (filed Sep. 10, 2018).

combined configurations. This Supplement confirms that the intense, pent-up demand for CBRS spectrum has continued to accelerate as full commercialization nears.

As noted in our initial ICD proposal, there will be a logical phasing of these partner deployments throughout the course of the ICD. In this Supplement, Federated Wireless provides the following:

- Attachment 1 contains updated, detailed descriptions of the processes and functionalities through which the Federated Wireless ICD will demonstrate the Federated Wireless SAS's compliance with the Commission's Part 96 requirements. Throughout Attachment 1, Federated Wireless describes the testing scenarios that will be used to demonstrate the Federated Wireless SAS's implementation of the required functions identified in the ICD PN.
- Attachment 2 is a template of the report that Federated Wireless plans to produce at the conclusion of the 30-day ICD reporting period to demonstrate compliance with the Commission's rules and the requirements set forth in the ICD PN.<sup>2</sup>
- Attachment 3 identifies each of Federated Wireless's commercial ICD partners and their deployment plans, which spans the compliance reporting period covering the first 30 days of ICD as well as the ramped deployment schedule for days 31 and beyond.

Federated Wireless looks forward to demonstrating, in collaboration with our partners, the commercial readiness of both its SAS and the CBRS industry through this ICD and to hosting Commission staff at ICD sites so they can see the CBRS system at work. Through the ICD process and beyond, Federated Wireless will continue to work with all stakeholders, DoD, NTIA, and the Commission to ensure CBRS is a success.

Should you require any additional information, please contact the undersigned.

Respectfully submitted,

/s/ Jennifer M. McCarthy  
Jennifer M. McCarthy  
Vice President, Legal Advocacy  
Federated Wireless, Inc.  
3865 Wilson Boulevard  
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Attachments

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<sup>2</sup> *Id.*

# **ATTACHMENT 1**

**[REDACTED]**

## **ATTACHMENT 2**

**[REDACTED]**

# **ATTACHMENT 3**

**[REDACTED]**